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November 30, 2021

VIA ECF

The Honorable Sanket J. Bulsara
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Richardson, et al. v. City of New York, et al., No. 21-cv-3609
(LDH) (SJB)

Dear Judge Bulsara:

I write on behalf of Plaintiffs—and pursuant to Rule III.C of the Court’s Individual Practices—to respectfully request that the Court endorse the proposed protective order attached as Exhibit 1. As required by Rule III.C, I have also attached a redline reflecting the case-specific revisions we have proposed to the “Protective Order Form” available on the Court’s website. That redline is Exhibit 2. All parties have agreed to this proposed protective order.

Respectfully submitted,



Joshua Matz

cc: Counsel of Record (via ECF)